

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

SEONG B. HONG and YONGSOON
JEONG,

Plaintiffs,

v.

UNITED STATES OF AMERICA,

Defendant(s).

:
: CASE NO.:
:
: **COMPLAINT WITH DEMAND FOR**
: **TRIAL BY JURY**
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Plaintiffs, SEONG B. HONG and YONGSOON JEONG, by way of Complaint, state:

PARTIES

1. Plaintiff, SEONG B. HONG, is an adult individual residing at 166 Bogert Rd, River Edge, NJ 07661.
2. Plaintiff, YONGSOON JEONG, is an adult individual residing at 125 E. Central Blvd. 2nd FL, Palisades Park, NJ 07650.
3. Defendant, UNITED STATES OF AMERICA, is a governmental defendant with an office located at 970 Broad Street, Newark, NJ 07102.

JURISDICTION AND VENUE

4. This Court had jurisdiction over this claim against the UNITED STATES OF AMERICA, pursuant to 28 U.S.C 1331.
5. The acts or omissions giving rise to the Plaintiff's claim occurred in the District of New Jersey. Venue is therefore proper under 28 U.S.C 1391(b).

ALLEGATIONS

6. On December 3, 2019, Plaintiff, SEONG B. HONG, was the driver of a motor vehicle with passenger Plaintiff, YONGSOON JEONG, which was traveling west on US 46 West at the intersection of Ridgefield Park, New Jersey.

7. At the same time and place aforesaid, ANGEL F. WOODARD, was driving a motor vehicle owned by Defendant, UNITED STATES OF AMERICA, which was also traveling west on US 46 West at the intersection of Ridgefield Park, New Jersey.

8. On or about December 3, 2019, an incident occurred when the Defendant's vehicle struck the vehicle driven by Plaintiff, SEONG B. HONG, with passenger Plaintiff, YONGSOON JEONG.

9. ANGEL F. WOODARD, operated his motor vehicle in such a careless and negligent manner so as to cause an accident with the vehicle which Plaintiff, SEONG B. HONG, was driving and Plaintiff, YONGSOON JEONG, was a passenger.

10. Defendant, UNITED STATES OF AMERICA, negligently entrusted its vehicle to ANGEL F. WOODARD.

11. At the time of the December 3, 2019, accident, ANGEL F. WOODARD, was an employee and/or agent of Defendant, UNITED STATES OF AMERICA, and was acting within the scope of his employment/agency.

12. As a direct and approximate result of said accident, Plaintiff, SEONG B. HONG, suffered severe painful bodily injuries, which injuries resulted in his obtaining medical treatment and sustaining loss wages which caused him great pain and suffering.

13. As a direct and approximate result of said accident, Plaintiff, YONGSOON JEONG, suffered severe painful bodily injuries, which injuries resulted in her obtaining medical treatment and sustaining loss wages which caused her great pain and suffering.

14. The acts or omissions by the Defendant described herein constitute the tort of negligence under the laws of the State of New Jersey.

15. Under the Federal Tort Claims Act, the Defendant is liable for these acts or omissions.

WHEREFORE, Plaintiffs, SEONG B. HONG and YONGSOON JEONG, demand judgment against the Defendant, UNITED STATES OF AMERICA, for damages, together with interest, cost of suit and attorneys' fees.

/s/ David Wasserman

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